

EXHIBIT C

Michael E. Lacy
D 804.697.1326
michael.lacy@troutman.com

September 6, 2023

VIA EMAIL

Paul Werner, Esquire
Sheppard, Mullin, Richter & Hampton L.L.P.
2099 Pennsylvania Ave., NW, Suite 100
Washington, D.C. 20006-6801

Re: Deposition Notice for Gail Boudreaux

Dear Paul:

I am following up on our email communications of yesterday concerning the deposition notice that Plaintiff Bond Pharmacy, Inc. d/b/a/ Advanced Infusion Solutions ("AIS") served upon Anthem at 11:15 PM on Friday, September 1 (the final day to notice depositions) to depose Gail Boudreaux, the President and CEO of Elevance Health, Inc. ("Elevance Health"). As you know, Elevance Health is not a party to any of the pending matters brought by AIS; rather, Elevance Health is the parent company of the Anthem entities that are parties to the matters. Therefore, as a threshold matter, the deposition notice is procedurally improper.

Moreover, as we expressed via email,¹ Ms. Boudreaux—who was not listed on AIS's Rule 26(a)(1) Initial Disclosures as a person with knowledge of the dispute—does not have any unique personal knowledge of any of the issues in this case, to the extent that she has any personal knowledge at all. And AIS's strained efforts to find a way to tie Ms. Boudreaux to this litigation are unavailing.

AIS points claims that Paige Henning "stated" in her deposition that Ms. Boudreaux had been "informed of and involved in" the contract negotiations between the parties, without any citation to the purported statements. We have reviewed Ms. Henning's deposition transcript and have not found any such statements. But even if Ms. Henning had made these statements, it would not justify AIS's eleventh hour attempt to depose Ms. Boudreaux.

AIS also points to certain member communications sent to Ms. Boudreaux as grounds for justifying its deposition notice. But as AIS well knows, these communications were only sent to Ms. Boudreaux **after AIS shared her direct email address and encouraged patients to contact her** well into the course of this litigation. See **Exhibit B**, ANTM_00058202 ("[AIS] included Gail's email address in their patient communication which has generated an influx of

¹ The email exchange between AIS and Anthem counsel is attached hereto as **Exhibit A**.

emails to Gail”); **Exhibit C**, AIS00068418 (“Please contact Anthem via letter, e-mail, or phone . . . [at] gail.boudreaux@Anthem.com.”). These letters do not establish that Ms. Boudreaux has any personal knowledge about the issues in this case, much less any unique knowledge. Far from it. They merely reflect AIS’s attempt to justify this late-filed, improper deposition notice by relying on communications it concocted itself after it sued Anthem.²

We are available to meet-and-confer on this topic today after 2 pm EST. Please let us know what times work for you.

Sincerely,



Michael E. Lacy

cc: Callan Stein
Virginia Bell Flynn
Sarah Siu
Harry Liberman

² The other e-mail AIS points to—ANTM_00018663—has no relevance to the present dispute, nor does it indicate any topic related to AIS that Ms. Boudreaux herself had personal knowledge of.

Exhibit A

Liberman, Harry J.

From: Paul Werner <PWerner@sheppardmullin.com>
Sent: Tuesday, September 5, 2023 2:04 PM
To: Stein, Callan G.
Cc: Angelo Pavone; Dave Thomas; Imad Matini; Amanda Witt; Charles Spencer-Davis; Calla Simeone; Kathryn J. Ryan; Tom Reklaitis; Alexandra Bustamante; Maria-Laura Coltre; Hannah Wigger; Siu, Sarah E.; Lacy, Michael E.; Flynn, Virginia Bell; Liberman, Harry J.
Subject: RE: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

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Cal, following up, Anthem produced a document (ANTM-00018663) in which there is a detailed reference to the CEO's concern about provider payments related to AIS, which confirms her direct involvement in such matters.

In addition, we understand from our clients that the CEO was informed of and involved in the contract negotiations (as stated by Paige Henning) as well as patient complaints involving the agreement terminations (and also based on documents produced by Anthem, ANTM-00058024; ANTM-00058202).

These are all relevant to the issues in dispute, proper areas of deposition inquiry, and based on the CEO's specific, first-hand involvement and knowledge of facts and issues in dispute.

We are happy to discuss scheduling and other aspects of the deposition with you.

Warm regards,

Paul Werner

+1 202-747-1931 | direct

+1 703-740-6892 | cell

PWerner@sheppardmullin.com | [Bio](#)

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From: Paul Werner <PWerner@sheppardmullin.com>
Sent: Tuesday, September 5, 2023 11:34 AM
To: Stein, Callan G. <Callan.Stein@troutman.com>
Cc: Angelo Pavone <apavone@sheppardmullin.com>; Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>; Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis <CSpencerDavis@sheppardmullin.com>; Calla Simeone <csimeone@sheppardmullin.com>; Kathryn J. Ryan

<katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra Bustamante <abustamante@sheppardmullin.com>; Maria-Laura Coltre <MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>; Siu, Sarah E. <Sarah.Siu@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Subject: Re: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

No Cal, we will be responding further to explain what we are interested in. After that, happy to discuss.

Paul Werner

+1 202-747-1931 | direct

+1 703-740-6892 | cell

PWerner@sheppardmullin.com | [Bio](#)

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On Sep 5, 2023, at 11:32 AM, Stein, Callan G. <Callan.Stein@troutman.com> wrote:

Paul:

I do not think it productive to engage in this discussion over email, but I am compelled to disagree with your assertion that our deposition of Mr. Castellanos—who you know full well was directly involved in the matters at issue here, was on hundreds (if not thousands) of relevant emails that AIS has produced, and was identified by AIS as one of its corporate representatives—is somehow for the purpose of “harassing” Bond. You know as well as I do that is not the case.

Regardless, it appears you are refusing to articulate your supposed basis for deposing Ms. Boudreaux, despite my request that you do so. Nonetheless, we are happy to meet and confer on this issue. Michael and I are available to do so from 3:30-5 today. If that time does not work, please propose some other times that do work.

Thank you.

Callan G. Stein

Partner

troutman pepper

Direct: 617.204.5103

callan.stein@troutman.com

From: Paul Werner <PWerner@sheppardmullin.com>

Sent: Tuesday, September 5, 2023 11:20 AM

To: Stein, Callan G. <Callan.Stein@troutman.com>; Angelo Pavone <apavone@sheppardmullin.com>

Cc: Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>;

Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis

<CSpencerDavis@sheppardmullin.com>; Calla Simeone <csimeone@sheppardmullin.com>; Kathryn J. Ryan <katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra Bustamante <abustamante@sheppardmullin.com>; Maria-Laura Coltre <MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>; Siu, Sarah E. <Sarah.Siu@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Subject: RE: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

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Cal – We do not need to justify the timing of our notice. As surely you know, there is always a rush to gather relevant evidence as the end of discovery nears. There is also some real irony in your objection given you all are deposing AIS's CEO as well – are you doing that just to harass him and the company (I had thought not until this am's missive)?

Paul Werner

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From: Stein, Callan G. <Callan.Stein@troutman.com>

Sent: Tuesday, September 5, 2023 11:15 AM

To: Paul Werner <PWerner@sheppardmullin.com>; Angelo Pavone <apavone@sheppardmullin.com>

Cc: Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>;

Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis

<CSpencerDavis@sheppardmullin.com>; Calla Simeone <csimeone@sheppardmullin.com>; Kathryn J.

Ryan <katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra

Bustamante <abustamante@sheppardmullin.com>; Maria-Laura Coltre

<MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>; Siu, Sarah E.

<Sarah.Siu@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell

<Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Subject: RE: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

Paul:

I have requested that you to articulate your supposed basis for deposing Ms. Boudreaux. We are happy to meet and confer on this issue, but for that to be productive I would appreciate it if you would respond to my request first. For starters, please articulate the involvement you allege Ms. Boudreaux had in the facts and circumstances here such that you believe you are entitled to send a notice of her deposition at 11:15pm the Friday before Labor Day weekend, six working days before the close of discovery.

Thank you.

Callan G. Stein

Partner

troutman pepper

Direct: 617.204.5103

callan.stein@troutman.com

From: Paul Werner <PWerner@sheppardmullin.com>

Sent: Tuesday, September 5, 2023 11:06 AM

To: Stein, Callan G. <Callan.Stein@troutman.com>; Angelo Pavone <apavone@sheppardmullin.com>

Cc: Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>;

Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis

<CSpencerDavis@sheppardmullin.com>; Calla Simeone <csimeone@sheppardmullin.com>; Kathryn J.

Ryan <katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra

Bustamante <abustamante@sheppardmullin.com>; Maria-Laura Coltre

<MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>; Siu, Sarah E.

<Sarah.Siu@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell

<Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Subject: RE: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

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Cal -- I will politely disregard your accusations, which are bogus (and unprofessional), for now and note your core assertion that Anthem's CEO had no involvement in the facts and circumstances here is demonstrably false. j She did, and we are entitled to depose her about it. We would be happy to meet and confer with you on that, but if we are going to do that, we need you to (a) get your facts straight and (b) drop the histrionics.

Warmest regards,

Paul Werner

+1 202-747-1931 | direct

+1 703-740-6892 | cell

PWerner@sheppardmullin.com | [Bio](#)

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From: Stein, Callan G. <Callan.Stein@troutman.com>

Sent: Tuesday, September 5, 2023 11:01 AM

To: Angelo Pavone <apavone@sheppardmullin.com>; Paul Werner <PWerner@sheppardmullin.com>

Cc: Dave Thomas <dthomas@sheppardmullin.com>; Imad Matini <IMatini@sheppardmullin.com>;

Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis <CSpencerDavis@sheppardmullin.com>; Calla Simeone <csimeone@sheppardmullin.com>; Kathryn J. Ryan <katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra Bustamante <abustamante@sheppardmullin.com>; Maria-Laura Coltre <MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>; Siu, Sarah E. <Sarah.Siu@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Subject: RE: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

Paul,

I am responding to Mr. Pavone's email below and its attachment. As you are well aware, Ms. Boudreaux is Anthem's CEO and she has had no involvement with the issues in this matter. AIS has already deposed Anthem's corporate representative and has deposed or will depose seven Anthem representatives (including Anthem's corporate representative) in their individual capacities. Based on the facts of this case, including what has been elicited thus far in discovery, it is clear that AIS has no reason or basis to depose Ms. Boudreaux, beyond harassment of Anthem. If AIS believes it has some valid basis for this deposition, please inform us of that basis immediately.

Beyond this lack of basis (and secondary to it), this request comes extremely late. Discovery closes in the E.D. Va. matter on September 12, and as you are well aware there are no dates available before the close of discovery to conduct this deposition. AIS's delinquency and choice to raise this deposition at the literal eleventh hour—Mr. Pavone's email was sent at 11:15pm, on the Friday before Labor Day weekend no less—is further evidence of its impropriety.

We will give AIS the opportunity to withdraw this deposition notice. Otherwise, we will seek court intervention and other appropriate remedies.

Callan G. Stein

Partner

troutman pepper

Direct: 617.204.5103

callan.stein@troutman.com

From: Angelo Pavone <apavone@sheppardmullin.com>

Sent: Friday, September 1, 2023 11:15 PM

To: Siu, Sarah E. <Sarah.Siu@troutman.com>; Stein, Callan G. <Callan.Stein@troutman.com>; Lacy, Michael E. <Michael.Lacy@troutman.com>; Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Liberman, Harry J. <Harry.Liberman@troutman.com>

Cc: Paul Werner <PWerner@sheppardmullin.com>; Dave Thomas <dthomas@sheppardmullin.com>;

Imad Matini <IMatini@sheppardmullin.com>; Amanda Witt <awitt@sheppardmullin.com>; Charles Spencer-Davis <CSpencerDavis@sheppardmullin.com>; Calla Simeone

<csimeone@sheppardmullin.com>; Kathryn J. Ryan <katryan@sheppardmullin.com>; Tom Reklaitis <TReklaitis@sheppardmullin.com>; Alexandra Bustamante <abustamante@sheppardmullin.com>;

Maria-Laura Coltre <MColtre@sheppardmullin.com>; Hannah Wigger <HWigger@sheppardmullin.com>

Subject: Bond Pharmacy, Inc., d/b/a AIS Healthcare v. Anthem Health Plans of Virginia, Inc.

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Counsel,

Please find attached AIS's deposition notice to Gail Boudreaux. Please let us know available dates as soon as possible.

Best regards,

Angelo Pavone | Associate
+1 202-747-2332 | direct
apavone@sheppardmullin.com

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Exhibit B

Message

From: Timmerman, Leah [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=03E7483C079F463F8DFF13142E116F1C-TIMMELH]
Sent: 4/5/2023 4:37:09 PM
To: Fregine, Kayla [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=aad13acba38c417eabcf67e0b18bdfd-AA01829]; Trowsell, Melissa [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=22f75ac27dae4a4eb6c03f66d46ce23d-AB36138]; Kovacs, Scott [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=64da2df14d2c43fab4f757964983bab6-AF36992]
CC: Sobecki, Patricia J. [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=0e8bfddfee9469e8f329eaa9465e9c2-AD33224]; Golias, Thomas [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c1c5966d696d4ee98a16fe6e72575d84-AG92151]; Boone, Rodney [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=438e8ea6e6b14636a6ffa82ef9ae7b2c-BOONERD]
Subject: FW: Bond/AIS Healthcare Termination

Kayla and Scott,

Melissa and her CM team will be supporting the Medicare Advantage member outreach. As soon as we have the final talking points ready, along with the updated member file, please share it with Melissa so their outreach can begin.

Rodney, FYI that Melissa is the contact for Medicare Advantage.

Thank you, Leah

From: Trowsell, Melissa <Melissa.Trowsell@anthem.com>
Sent: Wednesday, April 5, 2023 4:26 PM
To: Latif M.D., Omar <Omar.Latif@anthem.com>; Golias, Thomas <thomas.golias@elevancehealth.com>; Timmerman, Leah <leah.timmerman@elevancehealth.com>
Subject: RE: Bond/AIS Healthcare Termination

Thank you Omar. Our CM team will of course support this outreach once we have the member detail and talking points.



Elevance Health | 2022 Fortune 100 Best Companies to Work For™

Melissa Trowsell, MBA, RN

Staff Vice President – Medicare Clinical Operations, Elevance Health

Work at home Indiana (EST)

M: 765-202-2461

[elevancehealth.com](mailto:leah.timmerman@elevancehealth.com)

Administrative Assistant: Amy Fotheringham 360-420-5218

*For planning purposes I will be out of the office on the following dates:
April 18 – 20, 2023 (business travel)*

From: Latif M.D., Omar <Omar.Latif@anthem.com>
Sent: Wednesday, April 5, 2023 4:21 PM
To: Golias, Thomas <thomas.golias@elevancehealth.com>; Timmerman, Leah <leah.timmerman@elevancehealth.com>
Cc: Trowsell, Melissa <Melissa.Trowsell@anthem.com>
Subject: RE: Bond/AIS Healthcare Termination

Melissa for Medicare

From: Golias, Thomas <thomas.golias@elevancehealth.com>
Sent: Wednesday, April 5, 2023 1:21 PM
To: Hashmi, Razia <Razia.Hashmi@anthem.com>; Latif M.D., Omar <Omar.Latif@anthem.com>; McFadden, Adrienne <Adrienne.McFadden@elevancehealth.com>
Subject: RE: Bond/AIS Healthcare Termination

FYI folks, this is a very hot issue with a provider who has provided Gail's contact info to members, we are trying to settle this down and may need this outreach, will possibly require that clinical knowledge/your teams to do that. FAQs and TPs being finalized now....just need to know who we can point to as the clinical contacts. We've ID'd 460 members so far all markets/LOBs, not all need outreach day one so not a huge number.

From: Timmerman, Leah <leah.timmerman@elevancehealth.com>
Sent: Wednesday, April 5, 2023 3:39 PM
To: Hashmi, Razia <Razia.Hashmi@anthem.com>; Latif M.D., Omar <Omar.Latif@anthem.com>; McFadden, Adrienne <Adrienne.McFadden@elevancehealth.com>
Cc: Golias, Thomas <thomas.golias@elevancehealth.com>; Eisenstat, Paul <Paul.Eisenstat@anthem.com>; Boone, Rodney <rodney.boone@elevancehealth.com>; Fregine, Kayla <kayla.fregine@elevancehealth.com>; Kovacs, Scott <scott.kovacs@elevancehealth.com>; Sobecki, Patricia J. <patricia.sobecki@elevancehealth.com>
Subject: Bond/AIS Healthcare Termination
Importance: High

Hi Razia, Omar and Adrienne,

Hope you all are well. Reaching out to give you a heads up and ask for your support with this unexpected termination. Bond/AIS Healthcare notified us of their intent to immediately terminate their provider agreements last Friday, 3/31. There are approximately 480 members across all lines of business under their care. The provider included Gail's email address in their patient communication which has generated an influx of emails to Gail. As a next step, a request has been made for outreach to these members in order to coordinate their transition (or, if eligible, initiate continuity of care). Given the complex clinical nature of the services these members are receiving Customer Service is requesting support from UM on this member outreach. Talking points are being finalized now. In the meantime, who on your teams can assist with this member outreach?

Appreciate your help, Leah

From: Golias, Thomas <thomas.golias@elevancehealth.com>
Sent: Wednesday, April 5, 2023 8:53 AM
To: Eisenstat, Paul <Paul.Eisenstat@anthem.com>; Persinger, Jan <Jan.Persinger@anthem.com>; Keneally, Sean <Sean.Keneally@anthem.com>; Helmus, Scott <Scott.Helmus@carelon.com>; Benintendi, Laurie <laurie.benintendi@elevancehealth.com>; Gelein (LEGAL), Kelly <kelly.gelein@elevancehealth.com>
Cc: Marchetti, Paul <Paul.Marchetti@carelon.com>; Winn, Bryony <bryony.winn@elevancehealth.com>; Williams, Pam <pam.williams@elevancehealth.com>; Rothenberg-Williams, Michelle M. <michelle.rothenberg-williams@elevancehealth.com>; Boone, Rodney <rodney.boone@elevancehealth.com>; Timmerman, Leah <leah.timmerman@elevancehealth.com>; Edmonds, Daryl <Daryl.Edmonds@elevancehealth.com>; Vidor, Jordan <jordan.vidor@elevancehealth.com>; Persinger, Jan <Jan.Persinger@anthem.com>
Subject: RE: {EXTERNAL} Re: Anthem insurance -AIS Healthcare

REDACTED - PRIVILEGED

REDACTED - PRIVILEGED

From: Eisenstat, Paul <Paul.Eisenstat@anthem.com>

Sent: Wednesday, April 5, 2023 8:36 AM

To: Persinger, Jan <Jan.Persinger@anthem.com>; Keneally, Sean <Sean.Keneally@anthem.com>; Helmus, Scott <Scott.Helmus@carelon.com>; Golias, Thomas <thomas.golias@elevancehealth.com>; Benintendi, Laurie <laurie.benintendi@elevancehealth.com>; Gelein (LEGAL), Kelly <kelly.gelein@elevancehealth.com>

Cc: Marchetti, Paul <Paul.Marchetti@carelon.com>; Winn, Bryony <bryony.winn@elevancehealth.com>; Williams, Pam <pam.williams@elevancehealth.com>

Subject: RE: {EXTERNAL} Re: Anthem insurance -AIS Healthcare

REDACTED - PRIVILEGED

REDACTED - PRIVILEGED

Thanks.

Paul

From: Persinger, Jan <Jan.Persinger@anthem.com>

Sent: Wednesday, April 5, 2023 7:20 AM

To: Keneally, Sean <Sean.Keneally@anthem.com>; Eisenstat, Paul <Paul.Eisenstat@anthem.com>; Helmus, Scott <Scott.Helmus@carelon.com>; Golias, Thomas <thomas.golias@elevancehealth.com>

Subject: RE: {EXTERNAL} Re: Anthem insurance -AIS Healthcare

Adding Tom in...

From: Keneally, Sean <Sean.Keneally@anthem.com>

Sent: Tuesday, April 4, 2023 7:18 PM

To: Eisenstat, Paul <Paul.Eisenstat@anthem.com>; Helmus, Scott <Scott.Helmus@carelon.com>; Persinger, Jan <Jan.Persinger@anthem.com>

Subject: Fwd: {EXTERNAL} Re: Anthem insurance -AIS Healthcare

Do we know if this issue is part of the Carelon RX Tram or the Local team?

Sean

From: Boone, Rodney <rodney.boone@elevancehealth.com>

Sent: Tuesday, April 4, 2023 6:11 PM

To: Eisenstat, Paul <Paul.Eisenstat@anthem.com>; Keneally, Sean <Sean.Keneally@anthem.com>

Cc: Winn, Bryony <bryony.winn@elevancehealth.com>; Tandon, Saurabh <saurabh.tandon@elevancehealth.com>

Subject: FW: {EXTERNAL} Re: Anthem insurance -AIS Healthcare

FYI – AIS Healthcare has shared Gail’s info and this is about the 5th email we have seen today. Are we doing anything proactively to manage this with our members and/or provide alternatives? I assume that our contract negotiations broke down with them? Any insights would be helpful.

Thanks,
Rodney

From: Boudreaux, Gail <gail.boudreaux@elevancehealth.com>

Sent: Tuesday, April 4, 2023 5:41:38 PM (UTC-04:00) Atlantic Time (Canada)

To: Elevance Executive Concierge <ExecConcierge@elevancehealth.com>

Subject: Fwd: {EXTERNAL} Re: Anthem insurance

This appears to be a contract dispute issue. Please share with our contracting team

Sent from my iPhone

Begin forwarded message:

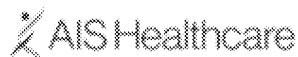
From: Hot Mess <pinkywade21@gmail.com>

Date: April 4, 2023 at 3:55:13 PM EDT

To: "Boudreaux, Gail" <gail.boudreaux@elevancehealth.com>, jon@renosparkshealthinsurance.com

Subject: {EXTERNAL} Re: Anthem insurance

This email originated outside the company. Do not click links or attachments unless you recognize the sender.



Important Change in AIS Healthcare's Network Status by Anthem

Dear Valued Patient:

As the provider of your implanted pump medications, your health and safety are our top priorities. AIS Healthcare's (AIS) pharmacists make your medication one syringe at a time in our state-of-the-art pharmacies under industry-leading quality standards. We also support you throughout your therapy with comprehensive care services, 24/7 clinical access and billing support.

Unfortunately, Anthem has limited your access to AIS's medication and nursing by refusing to honor its obligations to pay AIS for the care it provides to you. Anthem's decision is not based on any safety or quality concern, but instead is a cynical move to restrict your choice and put Anthem's profits over your health. Ultimately, Anthem's financially motivated decision adversely impacts patient and provider choice and compromises quality and safety.

As a result of Anthem's refusal to prioritize you and failure to pay AIS, we regret to inform you that AIS Healthcare will no longer be in Anthem's network as of March 31st, 2023. We understand that changes in coverage can be frightening and may significantly limit how, where and from whom you receive refills. Don't worry, AIS is here for you.

What does this mean for me?

After March 31st, 2023, you have a right to choose AIS as your preferred provider and AIS commits to continue providing your care, how, where and from whom you want to receive it, without disruption. This may impact how much you pay for AIS' services under Anthem insurance plans. Don't worry. AIS has a Financial Assistance Program to help eligible patients. Please call us at 877.299.4371, option 1, to learn more about our programs and services.

What can I do to prevent this change from happening?

Your voice matters. You have the power to change Anthem's decision. As their member, you have a right to participate in these decisions. Please contact Anthem via letter, e-mail, or phone and tell them to do whatever it takes to keep AIS in network.

Call: The number on the back of your membership card

Email: Gail Boudreaux (gail.boudreaux@Anthem.com)

Letters: Anthem, Attn: Gail Boudreaux, 120 Monument Circle, Indianapolis, IN 46204

Sincerely,

Simon Castellanos
CEO, AIS Healthcare

Advancing quality. Improving lives.

AIS Healthcare

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Dallas, TX 75287

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Suite 100
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P: 877.443.4006
F: 800.256.2220
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 api.tigertext.me



On Tue, Apr 4, 2023 at 12:53 PM Hot Mess <pinkywade21@gmail.com> wrote:

Here is the letter I received on 4/4/23 effective 3/31/23

I have a terminal illness E D S

why I have AIS to feel my medication for my pain pump refill every 2-4 weeks, without these meds my body would loose most all my abilities

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Hotmess

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Hotmess

Exhibit C



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Sincerely,

Simon Castellanos
CEO, AIS Healthcare

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AIS Healthcare

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